

United States District Court
District of Massachusetts

PAMELA JAMISON,
Plaintiff,

v.

CITY OF SPRINGFIELD,
MAYOR, DOMENIC SARNO
POLICE COMMISSIONER WILLIAM
J. FITCHET
DEPUTY CHIEF JOHN BARBIERI,
et al
Defendants,

CIVIL ACTION NO.:
3:14-cv-30161

JOINT PROPOSED SCHEDULING ORDER

Now come the Defendants, and request an order for discovery and a proposed schedule. The Defendants have attempted, in good faith, to conference with Plaintiff's Counsel about this schedule. The Defendants request that the filing of motions and pre-trial scheduling as follows:

1. All automatic discovery will be exchanged by May 14, 2015, which is 14 days from the scheduling conference that is set for April 30, 2015, pursuant to Fed.R.Civ.P. 26(a)(1)(c).
2. All written discovery requests will be served by July 29, 2015, which is 90 days from the scheduling conference.
3. All motions to amend pleadings to add parties, complying with Local Rule 15.1(B) , (which requires seeking an amendment that

would add a new party to serve the motion to amend on the proposed party at least 10 days prior to filing), be served by August 31, 2015, which is 123 days from the scheduling conference.

4. All non-expert depositions will be completed by December 1, 2015, which is 215 days from the scheduling conference.
5. Plaintiffs shall designate and disclose information regarding their trial experts as required by Fed. R. Civ. P. 26 (a)(2) by December 29, 2015, which is 243 days from the scheduling conference.
6. Defendants shall designate and disclose information regarding their trial experts as required by Fed. R. Civ. P. 26 (a)(2) by February 1, 2016, which is 277 days from the scheduling conference.
7. All expert depositions shall be completed by March 29, 2016, which is 334 days from the scheduling conference.
8. Defendants shall file their Summary Judgment motions, if any, by April 29, 2016, which is 365 days from the scheduling conference.
9. Plaintiffs' Opposition to Defendants' Motion for Summary Judgment shall be filed by May 30, 2016, which is 395 days from the scheduling conference to which Defendants may reply by June 17, 2016.
10. Issuance of an Order of the Court authorizing the deposition of the Plaintiff pursuant to F.R.C.P. 30(a)(2)(B).

Counsel will appear again before this court for a status conference thereafter.

Respectfully submitted,

**THE DEFENDANTS,
Justin Walter and
Eric Blair
By their attorney**

/s/ Kevin B. Coyle

Kevin B. Coyle, Esq.
BBO # 103540
1299 Page Blvd.
Springfield, MA 01104
Phone 413-787-1524
Fax 413-787-1703
attycoyle@aol.com

**THE DEFENDANT,
Eric Blair
By his attorney**

/s/ John T. Liebel

John T. Liebel, Esq.
BBO # 299660
Chief of Litigation
City of Springfield Law Department
36 Court Street, Room 210
Springfield, MA 01103
Phone: 413-787-6085
Fax: 413-787-6173
jliesel@springfieldcityhall.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the within Defendants' Proposed Scheduling Order document was this day served upon Plaintiff via the Federal Court's ECF Notice and delivery System to all parties.

SIGNED under the pains and penalties of perjury.

Dated: April 24, 2015

/s/ John T. Liebel

John T. Liebel, Esq.